

In re Patent Application of  
CLARKE ET AL.  
Serial No. 10/777,958  
Filed: 2/12/04

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#### REMARKS

The Examiner is thanked for the thorough examination of the present application. The patentability of the Claims is discussed below.

#### I. The Claimed Invention

The invention, as recited in independent Claim 1, for example, is directed to a communications system which includes a plurality of data storage devices each using at least one of a plurality of different operating protocols, and a plurality of mobile wireless communications devices for accessing the plurality of data storage devices. Each mobile wireless communications device also uses at least one of the plurality of different operating protocols. The system further includes a protocol interface device. In particular, the protocol interface device includes a protocol engine module for communicating with the plurality of data storage devices using respective operating protocols, and a front-end proxy module coupled to the protocol engine. The front-end proxy module includes a respective proxy module for communicating with the plurality of mobile wireless communications devices using each different operating protocol, and at least one common core service module connected to the proxy modules.

Independent Claim 12 is directed to a protocol interface devices of independent Claim 1. Independent Claim 18 is directed to protocol interface device for interfacing plurality of communications devices. Independent Claim 24 is

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directed to a related method, and independent Claim 29 is directed to a computer-readable medium.

## II. The Claims Are Patentable

The Examiner rejected the independent claims based upon U.S. Published Patent Application Serial No. 2006/0168095 to Sharma et al. Sharma et al. is directed to a system and method for multi-modal information delivery. The method includes receiving a first user request at a browser module operative in accordance with a first protocol applicable to a first mode of information delivery. The method further includes generating a browsing request in response to the first user request, wherein the browsing request identifies information available within a network. Multi-modal content is then created on the basis of the information identified by the browsing request and provided to the browser module. The multi-modal content is formatted in compliance with the first protocol and incorporates a reference to content formatted in accordance with a second protocol applicable to a second mode of information delivery.

Applicants submit that Sharma et al. fails to disclose a respective proxy module for communicating with the plurality of mobile wireless communications devices using each different operating protocol. Instead, Sharma et al. discloses a voice browser 110 that executes dialogues with the subscriber unit 102 using a known speech mark-up language, for example VoiceXML. (See Paragraph 0030). The voice browser 110, when a request has been determined to be formatted inconsistently with the target web server, sends a request to the conversion server 150. The

conversion server 150 replies with "the protocol of the voice browser." (Emphasis Added) (See Paragraph 0031). Data from the conversion server "compliant with the protocol of the voice browser" is then used as the basis for carrying out a dialogue with the user of the subscriber unit. (Emphasis Added). (See Paragraph 0031). The subscriber unit 102 communicates by sending "DTMF tones to, and receives audio output from the voice browser 110" Accordingly, the voice browser communicates with the both the subscriber unit 102 and the conversion server 150 using one protocol.

Additionally, Applicants submit that Sharma et al. fails to disclose each mobile wireless communications device using at least one of a plurality of different operating protocols, as in independent Claims 1, 12, 24 and 29. Instead, Sharma et al. discloses that the subscriber unit 102 communicates by sending DTMF tones to, and receives audio output from the voice browser 110. (See Paragraph 0032). Nowhere does Sharma et al. disclose the subscriber units 102 communicating using at least one of a plurality of different operating protocols. This argument also applies to independent Claim 18, which is similar to other independent claims.

Still further, Applicants submit that Sharma et al. fails to disclose at least one common core service module connected to the proxy module, as in the claimed invention. Sharma et al. discloses a voice browser coupled via the internet to a conversion server. (See Fig. 1). Nowhere in Sharma et al. does it disclose at least one common core service module connected to the proxy module, as in the claimed invention.

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Accordingly, it is submitted that independent claims are patentable over the prior art. Their respective dependent claims, which recite yet further distinguishing features, are also patentable over the prior art and require no further discussion herein.

#### CONCLUSION

In view of the arguments presented above, it is submitted that all of the claims are patentable. Accordingly, a Notice of Allowance is respectfully requested in due course. Should any minor informalities need to be addressed, the Examiner is encouraged to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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